

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PFIZER INC, PFIZER IRELAND
PHARMACEUTICALS, WARNER-
LAMBERT COMPANY, WARNER
LAMBERT COMPANY, LLC and
WARNER-LAMBERT EXPORT LTD.

Plaintiffs,

v.

RANBAXY LABORATORIES
LIMITED, RANBAXY
PHARMACEUTICALS, INC. and
RANBAXY INC.,

Defendants.

Civil Action No. 08-164 (JJF)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their respective counsel, subject to the approval of the Court, that as contemplated in the Stipulated Briefing Schedule on Ranbaxy's Motion to Dismiss Pfizer's Complaint filed on April 14, 2008 [D.I. 6]:

1. The parties agree that Pfizer will be permitted to conduct discovery directed to the subject matter jurisdiction defense asserted in Ranbaxy's Motion to Dismiss and supporting papers. The parties are in the process of reaching agreement concerning the scope of such discovery.

2. Pfizer's discovery on subject matter jurisdiction shall be completed by July 21, 2008.

3. Pfizer's Answering Brief in Opposition to Ranbaxy's Motion shall be filed by August 8, 2008.

4. Ranbaxy's Reply Brief shall be filed by August 22, 2008. However, should Ranbaxy assert the need for limited discovery of Pfizer on the issue of subject matter jurisdiction based on issues raised in Pfizer's Brief in Opposition, the parties will work to agree on a schedule for such discovery and a revised schedule for Ranbaxy's Reply Brief.

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DATED: May 16, 2008

IT IS SO ORDERED this _____ day of May, 2008.

United States District Judge